

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Proceeding by the Department of Telecommunications and Energy on its own Motion to Develop Requirements for Mass Migrations of Telecommunications Service End-Users)))))	D.T.E. 02-28
---	-----------------------	--------------

PETITION TO INTERVENE OF WORLDCOM, INC.

Pursuant to 220 C.M.R. §1.03(1), WorldCom, Inc. (“WorldCom”), on behalf of itself and its affiliated entities that provide telecommunications services in Massachusetts, hereby petitions the Department of Telecommunications and Energy (the “Department”) for leave to intervene as a party in this proceeding. WorldCom’s principal offices are located at 500 Clinton Center Drive, Clinton, Mississippi 39056. As grounds for its Petition, WorldCom states as follows:

1. Through various operating subsidiaries, WorldCom is authorized to offer domestic interstate, intrastate, local and international telecommunications services in each of the fifty states and the District of Columbia, and is a common carrier of telecommunications services authorized by the Department to provide interLATA and intraLATA services in Massachusetts. WorldCom serves end user customers in Massachusetts via its own facilities, as well as via facilities it leases from Verizon and other providers.
2. The Department, on its own motion, has opened a proceeding to develop requirements for the mass migration of telecommunications service end-users. The requirements to be developed in this proceeding could impact the manner in which WorldCom acquires end-user customers from carriers exiting segments of the Massachusetts telecommunications market and/or the manner in which WorldCom migrates customers to other carriers in the

event WorldCom exits a segment of the Massachusetts telecommunications market in which it currently operates or in which it may operate in the future.

3. As a telecommunications services provider in Massachusetts, WorldCom seeks to protect its interests by participating herein. WorldCom's interests in this matter cannot be adequately addressed or represented by any other party.
4. For the foregoing reasons, WorldCom will be substantially and specifically affected by the Department's review and decision in this docket.
5. WorldCom intends to fully participate in the proceedings. WorldCom will be submitting comments on the draft Guidelines filed with the Department on June 7, 2002; WorldCom will continue to participate in the proceedings as necessary to protect its interests.

WHEREFORE, WorldCom respectfully requests leave to intervene in this proceeding.

Respectfully submitted,

WORLD.COM, INC.

Christopher J. McDonald
WorldCom, Inc.
200 Park Avenue, 6th Floor
New York, NY 10166
(212) 519 4164
Fax (212) 519 4569
Christopher.McDonald@wcom.com

Dated: New York, New York
June 25, 2002

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Proceeding by the Department of Telecommunications and Energy on its own Motion to Develop Requirements for Mass Migrations of Telecommunications Service End-Users)))))	D.T.E. 02-28
---	-----------------------	--------------

APPEARANCE OF COUNSEL

In the above-captioned proceeding, the undersigned hereby appears for and on behalf of WorldCom, Inc. and its affiliated entities that provide telecommunications services in Massachusetts.

Respectfully submitted,

WORLDCOM, INC.

Christopher J. McDonald
WorldCom, Inc.
200 Park Avenue, 6th Floor
New York, NY 10166
(212) 519 4164
Fax (212) 519 4569
Christopher.McDonald@wcom.com

Dated: New York, New York
 June 25, 2002

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing upon each person designated on the attached service list by email and either U.S. mail or overnight courier.

Dated: New York, New York
June 25, 2002
